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President, LRC Co-Chair
David Givens
President Pro Tempore
Damon Thayer
Majority Floor Leader
Morgan McGarvey
Minority Floor Leader
Julie Raque Adams
Majority Caucus Chair
Reginald Thomas
Minority Caucus Chair
Mike Wilson
Majority Whip
Dennis Parrett
Minority Whip



LEGISLATIVE RESEARCH COMMISSION

State Capitol 700 Capital Avenue Frankfort KY 40601

502-564-8100

Capitol Fax 502-564-2922

Annex Fax 502-564-6543

legislature.ky.gov

Jay D. Hartz

Director

HOUSE MEMBERS

David W. Osborne
Speaker, LRC Co-Chair
David Meade
Speaker Pro Tempore
Steven Rudy
Majority Floor Leader
Joni L. Jenkins
Minority Floor Leader
Suzanne Miles
Majority Caucus Chair
Derrick Graham
Minority Caucus Chair
Chad McCoy
Majority Whip
Angie Hatton
Minority Whip

March 12, 2021

Dear Ms. Whites:

On January 13, 2021, you filed a petition for the impeachment of Representative Robert Goforth on behalf of petitioners Rebecca Tucker, Kelly Smith, Jeffrey Richey, Nikita Vundi, Rebecca Parrish, Laurie White, Emily LaDouceur, and Matthew Frederick. On February 23, 2021, the Impeachment Committee dismissed the petition.

KRS 63.070 states, in relevant part, that if the committee issues such a report, “the petitioner shall be liable to witnesses and to the accused for the costs of investigation before the committee. These costs shall be taxed by the clerk of the house appointing the committee.”

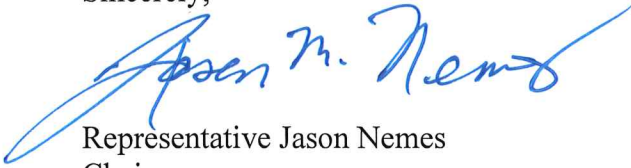
Attached to this letter are the complete lists of costs accrued by the Committee. Some of this information could be considered attorney work product. While the Committee recognizes that some information in attorney invoices may be protected by attorney-client privilege or the work-product doctrine, under these special circumstances it has opted not to redact any information from any invoices. It does, however, reserve the right to do so in the future.

Because multiple petitions were filed and taken up, not all costs will be attributed to your client(s). Instead, the Committee has allocated an amount based on work done directly as a result of your petition and a proportion of associated administrative expenses. That proportion includes work done after your petition was received divided by three. This was calculated because the Committee spent time working on the other petitions. The total amount is \$12,457.36. It is owed jointly and severally. In other words, all petitioners are independently responsible for the full amount.

The Committee has chosen to allow objections to any individual costs. A blanket objection to all costs will not be considered, as this is a mandatory process. Objections should be submitted electronically to the Clerk of the Committee at Elishea.Schweickart@LRC.KY.GOV by March 16 at noon. If no objections are filed, the Committee will submit the bill of costs to the Clerk of the House for further action.

The Committee has treated this matter with the seriousness and gravity that it deserves and expects all petitioners to do so as well.

Sincerely,

A handwritten signature in blue ink that reads "Jason M. Nemes". The signature is fluid and cursive, with a large initial 'J' and 'M'.

Representative Jason Nemes
Chair
2021 RS Impeachment Committee

Cc: Representative Robert Goforth



106 West Vine Street, Suite 800
P.O. Box 951
Lexington, Kentucky 40588-0951
(859) 255-2424
TAX ID: 61-0511733

February 24, 2021

LEGISLATIVE RESEARCH COMMISSION
ATTN: GREG WOOSLEY, GENERAL COUNSEL
DIRECTOR'S OFFICE
CAPITOL, ROOM 300
700 CAPITOL AVENUE
FRANKFORT, KY 40601

Invoice #:
Client #: LE124
Matter #: 710074
Billing Attorney: RKW

INVOICE SUMMARY

For professional services rendered and costs advanced through February 23, 2021:

RE: IMPEACHMENT COMMITTEE RE: GOFORTH

Total Professional Services	\$ 7,508.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 7,508.00



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February 24, 2021

Client.Matter: LE124 . 710074

RE: IMPEACHMENT COMMITTEE RE: GOFORTH

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
1/26/21	RKW	GO THROUGH GOFORTH MATERIALS.	.80
1/26/21	BMB	TEXTS WITH LAW CLERK ON NEEDED LEGAL RESEARCH; REVIEW AND COMMENT ON SAME	.30
1/26/21	HR	IN PREPARATION OF DRAFTING MEMO FOR IMPEACHMENT COMMITTEE, CONDUCTED RESEARCH REGARDING IMPEACHABILITY OF MEMBER OF HOUSE OF REPRESENTATIVES UNDER KY CONSTITUTION.	1.50
1/27/21	RKW	ADDITIONAL REVIEW OF MATERIALS ON GOFORTH.	.60
1/28/21	BMB	DISCUSS NEXT STEPS WITH KENT WESTBERRY AND LAW CLERK	.20
1/29/21	RKW	REVIEW SECTION 35 OF KY CONSTITUTION ON HOUSE DETERMINATION.	.80
2/01/21	RKW	WORK ON DRAFT RESPONSE AND TELECONFERENCE WITH JASON NEMES.	.80
2/01/21	BMB	LEA GAL RESEARCH, MULTIPLE TEXTS AND EMAILS; DRAFT LETTER	2.70
2/02/21	RKW	ADDITIONAL REVIEW AND REVISE GOFORTH LETTER.	.40
2/02/21	BMB	DOUBLE CHECK LEGAL SOURCE AND ADD TO LETTER	.60
2/03/21	RKW	MAKE REVISIONS TO LETTER.	.40
2/05/21	RKW	DISCUSS STATUS OF RECOMMENDATION ON IMPEACHMENT WITH COMMITTEE. EXCHANGE TEXTS WITH LAW PROFESSORS DOUGLAS AND SALAMAN. ADDITIONAL BRIEF REVIEW. MULTIPLE TELECONFERENCES WITH BRIDGET.	1.40
2/05/21	BMB	MULTIPLE TEXTS, CALLS AND EMAILS WITH KENT WESTBERRY AND LAW CLERK, CULMINATING IN REVISIONS TO LETTER	.80
2/05/21	HR	REVISED FINAL DRAFT OF IMPEACHMENT REPORT.	1.00
2/06/21	RKW	FINAL REVISIONS ON GOFORTH REPORT BEFORE SENDING. TELECONFERENCE WITH LAW CLERK.	.40
2/11/21	RKW	TRAVEL TO FRANKFORT FOR COMMITTEE HEARING ON GOFORTH. ATTEND HEARING. CONFERENCE AFTERWARDS IN EXECUTIVE SESSION. RETURN TO LOUISVILLE.	8.80
2/11/21	HR	DUE TO INCLEMENT WEATHER, DROVE TO FRANKFORT FROM LEXINGTON TO ATTEND IMPEACHMENT COMMITTEE MEETING; DISCUSSED DISMISSAL OF GOFORTH PETITION.	8.80
2/13/21	RKW	REVIEW EMAILS AND DRAFTS OF LATEST REPORT ON GOFORTH. E-MAIL EXCHANGES WITH BRIDGET.	.40
2/13/21	BMB	REVIEW LATEST DRAFT; EMAILS WITH KENT WESTBERRY	.30
2/13/21	HR	IN PREPARATION FOR FINAL REPORT, EMAILED PROFESSORS WHO HAD GIVEN TESTIMONY BEFORE COMMITTEE ON 2/11/21 AND REQUESTED COPIES OF THEIR TESTIMONIES.	.20
2/13/21	HR	REVISED FINAL DRAFT OF REPORT DISMISSING IMPEACHMENT PETITION OF REP. ROBERT GOFORTH.	1.00
2/14/21	RKW	ADDITIONAL REVIEW OF AUTHORITIES RELATED TO COSTS, ALL ON DRAFT.	1.20
2/14/21	BMB	REVIEW EXPERT TESTIMONY; RECEIPT, REVIEW AND RESPONSE TO MULTIPLE REVISIONS TO DRAFT AND RELATED EMAILS	.60
2/15/21	RKW	PREPARE FINAL DRAFT OF REPORT AND MEMO TO CIRCULATE TO COMMITTEE. ADDITIONAL REVIEW AND REVISIONS ON REPORT.	2.20

February 24, 2021

Date	Atty	Description	Hours
2/15/21	BMB	DRAFT ADDITIONAL REVISIONS	.40
2/16/21	RKW	FINAL REVISIONS. EXCHANGE EMAILS WITH JASON. SEND REPORT OUT.	.80
2/19/21	BMB	TELEPHONE CONFERENCE WITH KENT WESTBERRY REVISIONS	.10
2/22/21	RKW	REVIEW DRAFT OF REPORT AND RECOMMENDATION FOR EDITS. ATTEND COMMITTEE HEARING BY ZOOM. GO THROUGH REPORT LINE BY LINE, DISCUSS AND MAKE EDITS.	2.20
2/22/21	HR	DROVE TO FRANKFORT FROM LEXINGTON AT AROUND 12:30PM TO ATTEND IMPEACHMENT COMMITTEE MEETING AT 2PM; MEETING ENDED AROUND 3:50PM; DROVE BACK TO LEXINGTON.	1.00
2/22/21	HR	WENT OVER GOFORTH DISMISSAL DRAFT WITH COMMITTEE AND MADE EDITS.	1.00
2/23/21	RKW	ADDITIONAL REVIEW OF GOFORTH REVISIONS. COMMUNICATE WITH JASON, BRIDGET AND HUNTER.	1.40
2/23/21	RKW	REVIEW DRAFT REPORT, PREPARE FOR HEARING.	.60
2/23/21	RKW	GO THROUGH REPORT WITH COMMITTEE, MAKE EDITS AND DISCUSS.	.90
2/23/21	BMB	EMAILS RE COST ISSUE; REVIEW ADDITIONAL RESEARCH AND REVISIONS	.60
2/23/21	HR	DROVE TO FRANKFORT FROM LEXINGTON AT AROUND 3PM TO ATTEND IMPEACHMENT COMMITTEE MEETING AT 4PM; MEETING STARTED AT 6:30PM AND ENDED AROUND 10:45PM; THEN DROVE BACK TO LEXINGTON.	1.30
2/23/21	HR	REVIEWED FINAL DRAFT WITH COMMITTEE AND MAKE FINAL EDITS TO REPORT.	1.30
Total Professional Services			47.80

TOTAL PROFESSIONAL SERVICES**\$ 7,508.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Hours	Total
R. KENT WESTBERRY	24.10	4,820.00
BRIDGET MALONEY BUSH	6.60	1,320.00
HUNTER ROMMELMAN	17.10	1,368.00
Total	47.80	\$ 7,508.00

TOTAL THIS INVOICE**\$ 7,508.00**

279 Cassidy Ave.
Lexington, KY 40502
(859) 338-7287

February 12, 2021

The Honorable Jason Nemes
Chairman, Impeachment Committee
House of Representatives
Commonwealth of Kentucky
702 Capital Ave.
Annex Room 416C
Frankfort, KY 40601

In re Goforth

Dear Chairman Nemes:

Thank you again for inviting me to testify before the Impeachment Committee. My total time devoted to this matter is as follows:

<u>Day</u>	<u>Date</u>	<u>Time</u>
Mon.	Feb. 8	1.7 hrs.
Weds.	Feb. 10	0.2 hrs.
Thurs.	Feb. 11	3.7 hrs.
<u>Total</u>		<u>5.6 hrs.</u>

At \$420 per hour, that works out to \$2352.

Please let me know if you have any questions, or if you need any supporting documentation. Thank you again.

Very truly yours,

Paul E. Salamanca

Invoice

March 4, 2021

Kentucky House of Representatives
Impeachment Committee
700 Capital Ave.
Frankfort, KY 40601

On February 11, 2021, I testified before the House of Representatives Impeachment Committee on the matter of the impeachment of Rep. Robert Goforth. Pursuant to Kentucky Rev. Stat. § 63.070, I am submitting this invoice for my time spent on the research, preparation, and testimony.

- Feb. 7, 1.5 hours: research on KY impeachment procedure and definition of “civil officer,” including both federal precedent and KY authorities
- Feb. 9, 1.5 hours: draft testimony
- Feb. 10, .5 hours: revise testimony
- Feb. 11, .5 hours: deliver testimony, answer questions, and finalize written testimony for submission

Total time: 4 hours

Standard rate for expert work: \$420

Total amount billed: \$1,680

Thanks,

Joshua A. Douglas
Ashland, Inc-Spears Distinguished Research Professor of Law
University of Kentucky J. David Rosenberg College of Law
620 S. Limestone
Lexington, KY 40506



Andy Beshear
Governor

KENTUCKY STATE POLICE

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Mary C. Noble
Secretary

Col. Phillip Burnett, Jr.
Acting Commissioner

MEMORANDUM

TO: Lieutenant Jason Palmer, Legislative Security Detail

FROM: Lieutenant Colonel Kyle J. Nall, Unit 3

DATE: March 8, 2021

SUBJECT: Average Trooper Salary Re: Costs Incurred in Impeachment Hearings

This memo is intended to document, through an estimated salary rate, the costs incurred by assigning Troopers on the Legislative Security Detail to staff the Impeachment Hearings during the 2021 Regular Session of the Kentucky General Assembly. Below is a table outlining the average salary components and fringe benefit costs associated with the average Kentucky State Police Trooper with up to 5 years of tenure with the agency:

Troopers up to 5 Years of Service	Average Annual Base	Ave. Annual FICA	Ave. Annual Retirement	Annual Average Health	Ave. Annual Life	Grand Total
Current personnel (303)	\$42,209.40	\$3,229.02	\$60,562.05	\$8,800.00	\$12.00	\$114,812.47
Average per Salary Schedule	\$42,902.74	\$3,282.06	\$61,556.86	\$8,800.00	\$12.00	\$116,553.66

These figures were provided by Rachil Malhotra through a report she generated on the Kentucky Human Resources Information System (KHRIS). In converting the total into an hourly rate ($116,553.66/2080$), the finding is \$56.04/hour.

After reviewing the schedule provided by the Legislative Research Commission (detailed below), it appears that approximately 19 personnel hours were spent staffing the impeachment hearings.

January 13 th – 5:30pm to 6:23pm	1 hour
January 27 th – 3:04pm to 5:48pm	2.75 hours
February 3 rd – 4:05pm to 7:52pm	3.75 hours
February 4 th - 4:51pm to 5:35pm	0.75 hour

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February 5 th – 9:12am to 12:25pm	3.25 hours
February 11 th – 8:46pm to 9:57pm	1.25 hours
February 22 nd – 2:09pm to 3:36pm	1.50 hours
February 23 rd - 5:57pm to 10:38pm	4.75 hours

The estimated average cost incurred from staffing these hearings was \$1,064.76. If any additional information is needed regarding this request, please let me know as soon as possible.

Lt. Colonel Kyle J. Nall, Unit 3
Office of Administrative Services

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2021 Impeachment Committee LRC Staff Time

[REDACTED] 20 hours

- January 13 2.5 hours
- February 3 3.5
- February 4 2 hours
- February 11 5.5 hours
- February 23 6.5 hours

[REDACTED] 3.0 hours

- February 4 1.5 hours
- February 11 1.5 hours

[REDACTED] 2.0 hours

- February 22 1 hour
- February 23 1 hour

[REDACTED] 5.5 hours

- January 13 2 hours
- February 11 0.5 hours
- February 22 1 hour
- February 23 2 hours

[REDACTED] 13.5 hours

- January 13 2 hours
- January 27 1.5 hours
- February 3 4 hours
- February 23 6 hours

[REDACTED] 21 hours

- January 13 3.5 hours
- January 20 1 hour
- January 27 2.5 hours
- February 3 4.5 hours
- February 4 1 hour
- February 11 2.5 hours
- February 23 6 hours

[REDACTED] 11 hours

- January 13 2 hours
- February 3 2 hours
- February 11 3 hours
- February 23 4 hours

Total 76 hours

\$2,310.31